

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re:

PROMESA
Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

(Jointly Administered)

Re: Docket # 21434

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**PEERLESS OIL & CHEMICALS, INC. RESPONSE TO THE FOUR HUNDRED
EIGHTY-SECOND OMNIBUS OBJECTION (SUBSTANTIVE) OF THE
COMMONWEALTH OF PUERTO RICO AND THE PUERTO RICO ELECTRIC
POWER AUTHORITY TO CLAIMS THAT ARE PARTIALLY SATISFIED AND
PARTIALLY ASSERT AMOUNTS FOR WHICH PREPA IS NOT LIABLE**

TO THE HONORABLE JUDGE LAURA TAYLOR SWAIN:

COME NOW PEERLESS OIL & CHEMICALS, INC. (“Peerless”) represented by the
undersigned attorney and respectfully sets forth and prays:

1. That on July 1, 2022, the Commonwealth of Puerto Rico (the “Commonwealth”) and the Puerto Rico Electric Power Authority (“PREPA”) filed the Four Hundred Eighty-Second

¹ The Debtors in these Title III Cases, along with each Debtor’s respective title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Omnibus Substantive Objection (docket # 21434) (substantive) to the claims listed in item 19 Exhibit A (docket # 21434-1).

2. That on May 17, 2018, Peerless filed claim number 166347 in the amount of \$28,667.38 as listed in Exhibit A, item 19 attached to the Four Hundred Eighty-Second Omnibus Objection to Claims.

3. That Peerless admits having received payments in the amount of \$16,338.23 on account of claim number 166347 and the balance currently owed is \$12,077.11.

4. The only amount really in dispute is \$252.04, which of inconsequential value and in the interest of the judicial economy and prompt disposition of the present contested matter Peerless consents to the entry of judgment according to the pleadings in the Four Hundred Eighty-Second Omnibus Substantive Objection (docket # 21434) (substantive) to the claims listed in item 19 Exhibit A (docket # 21434-1).

WHEREFORE Peerless hereby consent to the entry of judgment according to the Four Hundred Eighty-Second Omnibus Substantive Objection (docket # 21434) (substantive) to the claims listed in item 19 Exhibit A (docket # 21434-1).

CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I hereby certify that on even date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: to all attorneys that have filed their respective notice of appearance and to the Standard Parties as such term is defined in the Court's Order Establishing Case Management Procedures, supra:

- (i) Chambers of the Honorable Laura Taylor Swain (two copies shall be delivered to each chambers listed below):

United States District Court for the District of Puerto Rico
150 Carlos Chardón Street,
Federal Building, Office 150,
San Juan, P.R. 00918-1767

-and-

United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Suite No. 3212
New York, New York 10007-1312

- (ii) Office of the United States Trustee for Region 21
Edificio Ochoa, 500 Tanca Street, Suite 301
San Juan, PR 00901-1922

- (iii) Puerto Rico Fiscal Agency and Financial Advisory Authority (AAFAF):

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And I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: to the members of the Creditors' Committee at their postal address of record.

In San Juan, Puerto Rico, this 29th day of July, 2022.

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